

Bay Area Air Quality Management District

939 Ellis Street
San Francisco, CA 94109
(415) 771-6000

Final

MAJOR FACILITY REVIEW PERMIT

Issued To:
Wincup
Facility # A1317

Facility Address:
195 Tamal Vista Boulevard
Corte Madera, CA 94925

Mailing Address:
195 Tamal Vista Boulevard
Corte Madera, CA 94925

Responsible Official
Van D. Groenewold, V.P. Engineering
(602) 936-1791

Facility Contact
John Paterson, Safety Supervisor
(415) 886-6025

Type of Facility: Manufacturing
Primary SIC: 3086
Product: Foam Cups

BAAQMD Permit Division Contact:
Craig Ullery

ISSUED BY THE BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Ellen Garvey, Executive Officer/Air Pollution Control Officer

Date

TABLE OF CONTENTS

I. STANDARD CONDITIONS	3
II. EQUIPMENT	7
III. GENERALLY APPLICABLE REQUIREMENTS	9
IV. SOURCE-SPECIFIC APPLICABLE REQUIREMENTS	12
V. SCHEDULE OF COMPLIANCE.....	19
VI. PERMIT CONDITIONS.....	19
VII. APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS	21
VIII. TEST METHODS	26
IX. GLOSSARY	28
X. APPLICABLE STATE IMPLEMENTATION PLAN	32

I. STANDARD CONDITIONS

A. Administrative Requirements

The permit holder shall comply with all applicable requirements in the following regulations:

BAAQMD Regulation 1 - General Provisions and Definitions

(as amended by the District Board on 10/7/98);

SIP Regulation 1 - General Provisions and Definitions

(as approved by EPA through 8/27/99);

BAAQMD Regulation 2, Rule 1 - Permits, General Requirements

(as amended by the District Board on 10/7/98);

SIP Regulation 2, Rule 1 - Permits, General Requirements

(as approved by EPA through 1/26/99);

BAAQMD Regulation 2, Rule 2 - Permits, New Source Review

(as amended by the District Board on 10/7/98);

SIP Regulation 2, Rule 2 - Permits, New Source Review and Prevention of Significant Deterioration

(as approved by EPA through 1/26/99);

BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking

(as amended by the District Board on 10/7/98); and

SIP Regulation 2, Rule 4 - Permits, Emissions Banking

(as approved by EPA through 1/26/99).

B. Conditions to Implement Regulation 2, Rule 6, Major Facility Review

1. This Major Facility Review Permit was issued on November 1, 1999, and expires on October 31, 2004. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than April 30, 2004 and no earlier than October 31, 2003. **If a complete application for renewal has not been submitted in accordance with these deadlines, the facility may not operate after** October 31, 2004. (Regulation 2-6-307, 404.2, & 409.6; MOP Volume II, Part 3, §4.2)
2. The permit holder shall comply with all conditions of this permit. The permit consists of this document and all appendices. Any non-compliance with the terms and conditions of this permit will constitute a violation of the law and will be grounds for enforcement action; permit termination, revocation and re-issuance, or modification; or denial of a permit renewal application. (Regulation 2-6-307; MOP Volume II, Part 3, §4.11)
3. In the event any enforcement action is brought as a result of a violation of any term or condition of this permit, the fact that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with such term or condition shall not be a defense to such enforcement action. (MOP Volume II, Part 3, §4.11)
4. This permit may be modified, revoked, reopened and reissued, or terminated for cause. (Regulation 2-6-307, 409.8, 415; MOP Volume II, Part 3, §4.11)

I. Standard Conditions

5. The filing of a request by the facility for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated non-compliance does not stay the applicability of any permit condition. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)
6. This permit does not convey any property rights of any sort, nor any exclusive privilege. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)
7. The permit holder shall supply within 30 days any information that the District requests in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. (Regulation 1-441, Regulation 2-6-409.4 & 501; MOP Volume II, Part 3, §4.11)
8. Any records required to be maintained pursuant to this permit which the permittee considers to contain proprietary or trade secret information shall be prominently designated as such. Copies of any such proprietary or trade secret information which are provided to the District shall be maintained by the District in a locked confidential file, provided, however, that requests from the public for the review of any such information shall be handled in accordance with the District's procedures set forth in Section 11 of the District Administrative Code. (Regulation 2-6-419; MOP Volume II, Part 3, §4.11)
9. Proprietary or trade secret information provided to EPA will be subject to the requirements of 40 CFR Part 2, Subpart B - Public Information, Confidentiality of Business Information. (40 CFR Part 2)
10. The emissions inventory submitted with the application for this Major Facility Review Permit is an estimate of actual emissions for the time period stated and is included only as one means of determining applicable requirements for emission sources. It does not establish, or constitute a basis for establishing, any new emission limitations. (MOP Volume II, Part 3, §4.11)

C. Requirement to Pay Fees

The permit holder shall pay annual fees in accordance with District Regulation 3, including Schedule P. (Regulation 2-6-402 & 409.13, Regulation 3; MOP Volume II, Part 3, §4.12)

D. Inspection and Entry

Access to Facility: The permit holder shall provide reasonable access to the facility and equipment which is subject to this permit to the APCO and/or to his or her designee. (Regulation 1-440, Regulation 2-6-409.3; MOP Volume II, Part 3, §4.14)

E. Records

Notwithstanding the specific wording in any requirement, all records for federally enforceable requirements shall be maintained for at least five years from the date of entry. (Regulation 2-6-501, Regulation 3; MOP Volume II, Part 3, §4.7)

F. Monitoring Reports

Reports of all required monitoring must be submitted to the District at least once every six months, except where an applicable requirement specifies more frequent reporting. The

I. Standard Conditions

first reporting period for this permit shall be November 1, 1999 to April 30, 2000. The report shall be submitted by May 31, 2000. Subsequent reports shall be for the following periods: May 1st through October 31st and November 1st through April 30th, and are due on the last day of the month after the end of the reporting period. All instances of non-compliance shall be clearly identified in these reports. The reports shall be certified by the responsible official as true, accurate, and complete. In addition, all instances of non-compliance with the permit shall be reported in writing to the District's Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions. The reports shall be sent to the following address:

Director of Compliance and Enforcement
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109
Attn: Title V Reports

(Regulation 2-6-502, Regulation 3; MOP Volume II, Part 3, §4.7)

G. Compliance Certification

Compliance certifications shall be submitted annually by the responsible official of this facility to the Bay Area Air Quality Management District and to the Environmental Protection Agency. The certification period will be November 1st to October 31st. The certification shall be submitted by November 30th of each year. The certification must list each applicable requirement, the compliance status, whether compliance was continuous or intermittent, the method used to determine compliance, and any other specific information required by the permit. The permit holder may satisfy this requirement through submittal of District-generated Compliance Certification forms. The certification should be directed to the District's Compliance and Enforcement Division at the address above, and a copy of the certification should be sent to the Environmental Protection Agency at the following address:

Director of the Air Division
USEPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105
Attention: Air-3

(MOP Volume II, Part 3, §4.5 and 4.15)

H. Emergency Provisions

1. The permit holder may seek relief from enforcement action in the event of a

I. Standard Conditions

breakdown, as defined by Regulation 1-208 of the District's Rules and Regulations, by following the procedures contained in Regulations 1-431 and 1-432. The District will thereafter determine whether breakdown relief will be granted in accordance with Regulation 1-433. (MOP Volume II, Part 3, §4.8)

2. The permit holder may seek relief from enforcement action for a violation of any of the terms and conditions of this permit caused by conditions beyond the permit holder's reasonable control by applying to the District's Hearing Board for a variance pursuant to Health and Safety Code Section 42350. The Hearing Board will determine after notice and hearing whether variance relief should be granted in accordance with the procedures and standards set forth in Health and Safety Code Section 42350 et seq. Any variance granted by the Hearing Board from any term or condition of this permit which lasts longer than 90 days will be subject to EPA approval. (MOP Volume II, Part 3, §4.8)
3. Notwithstanding the foregoing, the granting by the District of breakdown relief or the issuance by the Hearing Board of a variance will not provide relief from federal enforcement unless the Major Facility Review Permit has been modified pursuant to Regulation 2, Rule 6. (MOP Volume II, Part 3, §4.8)

I. Severability

In the event that any provision of this permit is invalidated by a court or tribunal of competent jurisdiction, or by the Administrator of the EPA, all remaining portions of the permit shall remain in full force and effect. (Regulation 2-6-409.5; MOP Volume II, Part 3, §4.10)

II. EQUIPMENT

Table II A - Permitted Sources

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits.

S-#	Description	Make or Type	Model	Capacity
S-1	Boiler (natural gas)	Johnston 3-Pass	534	23 MM Btu/hr
S-2	Boiler (natural gas)	Johnston 4-Pass	530	19 MM Btu/hr
S-4	Foam Cup Molding Lines 1-10	Cup Molding Machines	80-HK	0.42 tph
S-5	Foam Cup Molding Lines 11-16	Cup Molding Machines	48-HK	0.36 tph
S-6	Foam Cup Molding Lines 17-25	Cup Molding Machines	30-HK	0.21 tph
S-7	Foam Cup Molding Lines 27-30	Cup Molding Machines	26-HK	0.21 tph
S-8	Offset Press for Printer Lines 11-15 and 27-30	HK C. UV Printer		300 cups/min
S-10	Thermoforming Sheet Lines 1-6	American Western	1400	0.27 tph
S-11	Pre-Expander	Artisan/Rodman		0.3 tph
S-12	Pre-Expander	Artisan/Rodman		0.3 tph
S-13	Pre-Expander	Artisan/Rodman		0.3 tph
S-14	Pre-Expander	Artisan/Rodman		0.3 tph
S-15	Pre-Expander	Artisan/Rodman		0.3 tph
S-17	Cold Cleaner	Graymills/Tempest		300 gal/yr
S-18	Offset Press	HK C. UV Printer		150 cups/min
S-19	Offset Press	HK C. UV Printer		150 cups/min
S-20	Offset Press	HK C. UV Printer		150 cups/min
S-21	Offset Press	HK C. UV Printer		150 cups/min
S-22	Offset Press	HK C. UV Printer		150 cups/min
S-23	Offset Press	HK C. UV Printer		150 cups/min
S-24	Offset Press	HK C. UV Printer		150 cups/min

II. Equipment

Table II B - Abatement Devices

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
S-1	3-Pass, Steam Boiler, 600 HP	S-11, S-12, S-13, S-14, S-15	SIP Regulation 8, Rule 4, Section 302.2	1750 degrees F	90%
S-1	3-Pass, Steam Boiler, 600 HP (after 6/1/2000, not federally enforceable)	S-11, S-12, S-13, S-14, S-15	BAAQMD Regulation 8, Rule 52, Section 301.1		< 2.8 lb/100 lb raw material processed
S-1	3-Pass, Steam Boiler, 600 HP (after 6/1/2000, not federally enforceable)	S-11, S-12, S-13, S-14, S-15	BAAQMD Regulation 8, Rule 52, Section 304		98%
S-2	4-Pass, Steam Boiler, 500 HP	S-11, S-12, S-13, S-14, S-15	Regulation 8, Rule 4, Section 302.2	1750 degrees F	90%
S-2	4-Pass, Steam Boiler, 500 HP (after 6/1/2000, not federally enforceable)	S-11, S-12, S-13, S-14, S-15	BAAQMD Regulation 8, Rule 52, Section 301.1		< 2.8 lb/100 lb raw material processed
S-2	4-Pass, Steam Boiler, 500 HP (after 6/1/2000, not federally enforceable)	S-11, S-12, S-13, S-14, S-15	BAAQMD Regulation 8, Rule 52, Section 304		98%

III. GENERALLY APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. These requirements apply in a general manner to the facility and/or to sources exempt from the requirement to obtain a District Permit to Operate. The District has determined that these requirements would not be violated under normal, routine operations, and that no additional periodic monitoring or reporting to demonstrate compliance is warranted. In cases where a requirement, in addition to being generally applicable, is also specifically applicable to one or more sources, the requirement and the source are also included in Section IV, Source-Specific Applicable Requirements, of this permit.

The dates in parenthesis in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full language of SIP requirements is included in Appendix A of this permit if the SIP requirement is different from the current BAAQMD requirement.

NOTE:

There are differences between the current BAAQMD rule and the version of the rule in the SIP. For specific information, contact the District's Rule Development Section of the Enforcement Division. All sources must comply with both versions of the rule until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

Table III
Generally Applicable Requirements

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)
BAAQMD Regulation 1	General Provisions and Definitions (10/7/98)	N
SIP Regulation 1	General Provisions and Definitions (8/27/99)	Y
BAAQMD Regulation 4	Air Pollution Episode Plan (3/20/91)	N
SIP Regulation 4	Air Pollution Episode Plan (8/06/90)	Y
BAAQMD Regulation 5	Open Burning (11/2/94)	N
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)	N
BAAQMD Regulation 7	Odorous Substances (3/17/82)	N

Facility Name: Wincup
Permit for Facility #: A1317
Expiration Date: October 31, 2004
ID: CSU

Table III
Generally Applicable Requirements

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)
BAAQMD Regulation 8, Rule 1	Organic Compounds - General Provisions (6/15/94)	Y

III. Generally Applicable Requirements

Table III
Generally Applicable Requirements

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)
BAAQMD Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (12/20/95)	Y
BAAQMD Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (12/20/95)	N
SIP Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (3/22/95)	Y
BAAQMD Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (12/20/95)	N
BAAQMD Regulation 11, Rule 2	Hazardous Pollutants - Asbestos Demolition, Renovation and Manufacturing (12/4/91)	Y
BAAQMD Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (7/11/90)	Y

IV. SOURCE-SPECIFIC APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. The requirements cited in the following tables apply in a specific manner to the indicated source(s).

The dates in parenthesis in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s):
 The date(s) of adoption or most recent amendment of the regulation by the District Board
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP:
 The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full text of each permit condition cited is included in Section VI, Permit Conditions, of this permit. The full language of SIP requirements is included in Appendix A of this permit if the SIP requirement is different from the current BAAQMD requirement.. All other text may be found in the regulations themselves.

Table IV-A
S-1 Boiler and S-2 Boiler

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 8, Rule 52	Polystyrene, Polypropylene, and Polyethylene Foam Product Manufacturing Operations (7/7/99)		
8-52-301	Polystyrene Foam Product Manufacturing Operations	N	6/1/2000
8-52-301.1	Polystyrene Cup Molding Standard	N	6/1/2000
8-52-304	Approved Emission Control System	N	6/1/2000
8-52-401	Compliance Schedule	N	
8-52-401.1	Application for Authority to Construct/Permit to Operate	N	11/15/1999
8-52-401.2	Compliance Date	N	6/1/2000
8-52-501	Records	N	6/1/2000
8-52-503	Approved Emission Control System, Recordkeeping Requirements	N	6/1/2000
8-52-505	Burden of Proof	N	6/1/2000

IV. Sources-specific Applicable Requirements

Table IV-A
S-1 Boiler and S-2 Boiler

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 9, Rule 1	Inorganic Gaseous Pollutants, Sulfur Dioxide (3/15/95)		
9-1-301	Limitations on Ground Level Concentrations	Y	
9-1-302	General Emission limitations	Y	
BAAQMD Regulation 9, Rule 7	Inorganic Gaseous Pollutants - Nitrogen Oxides and Carbon Monoxide from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters (9/15/93)		
9-7-301	Emission Limits-Gaseous Fuel	Y	
9-7-301.1	Emission Limits-NOx	Y	
9-7-301.2	Emission Limits-CO	Y	
9-7-503	Records	Y	
9-7-503.2	Records of natural gas curtailment	Y	
9-7-503.3	Records of equipment testing	Y	
9-7-503.4	Source test records	Y	
BAAQMD Condition #2055	Permit Conditions		
Condition 1	Abatement Requirement [Regulation 8, Rule 4]	Y	
Condition 2	Minimum destruction efficiency [Regulation 8, Rule 4]	Y	
Condition 3	Operating temperature of S-1 and S-2 shall be at least 1750 degree F at all times. [Regulation 2-1-403]	Y	
Condition 4	Operating temperature of S-1 and S-2 shall be recorded on a continuous temperature chart recorder. [Regulation 8-4-501]	Y	

IV. Sources-specific Applicable Requirements

Table IV-B
S-4, 5, 6, and 7 Foam Cup Molding Lines
and S-10 Thermoforming

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
SIP Regulation 8 Rule 2	Miscellaneous Operations (3/22/95)	Y	
8-2-301	Miscellaneous Operations	Y	
BAAQMD Regulation 8, Rule 52	Polystyrene, Polypropylene, and Polyethylene Foam Product Manufacturing Operations (7/7/99)		
8-52-301	Polystyrene Foam Product Manufacturing Operations	N	6/1/2000
8-52-301.1	Polystyrene Cup Molding Standard	N	6/1/2000
8-52-304	Approved Emission Control System	N	6/1/2000
8-52-401	Compliance Schedule	N	
8-52-401.1	Application for Authority to Construct/Permit to Operate	N	11/15/1999
8-52-401.2	Compliance Date	N	6/1/2000
8-52-501	Records	N	6/1/2000
8-52-503	Approved Emission Control System, Recordkeeping Requirements	N	6/1/2000
8-52-505	Burden of Proof	N	6/1/2000

Table IV-C
S-8 Offset Printing Lines

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 8 Rule 4	General Solvent and Surface Coating Operations (5/16/96)	N	
8-4-302	Solvents and Surface Coating Requirements	N	
8-4-302.1	Emissions of VOC shall not exceed 5 tons per calendar year	N	
8-4-312	Solvent Evaporation Loss Minimization	N	
8-4-501	Recordkeeping Requirements	N	

IV. Sources-specific Applicable Requirements

Table IV-C
S-8 Offset Printing Lines

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
SIP Regulation 8 Rule 4	General Solvent and Surface Coating Operations (12/9/94)	Y	
8-4-302	Solvents and Surface Coating Requirements	Y	
8-4-501	Recordkeeping Requirements	Y	

Table IV-D
S-11 through 15 Pre-Expanders

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
SIP Regulation 8 Rule 2	Miscellaneous Operations (3/22/95)	Y	
8-2-301	Miscellaneous Operations	Y	
BAAQMD Regulation 8, Rule 52	Polystyrene, Polypropylene, and Polyethylene Foam Product Manufacturing Operations (7/7/99)		
8-52-301	Polystyrene Foam Product Manufacturing Operations	N	6/1/2000
8-52-301.1	Polystyrene Cup Molding Standard	N	6/1/2000
8-52-304	Approved Emission Control System	N	6/1/2000
8-52-401	Compliance Schedule	N	
8-52-401.1	Application for Authority to Construct/Permit to Operate	N	11/15/1999
8-52-401.2	Compliance Date	N	6/1/2000
8-52-501	Records	N	6/1/2000
8-52-503	Approved Emission Control System, Recordkeeping Requirements	N	6/1/2000
8-52-505	Burden of Proof	N	6/1/2000
BAAQMD Condition #2055	Permit Conditions		
Part 1	Abatement Requirement [Regulation 8, Rule 4]	Y	
Part 2	Minimum destruction efficiency [Regulation 8, Rule 4]	Y	

IV. Sources-specific Applicable Requirements

Table IV-D
S-11 through 15 Pre-Expanders

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
Part 3	Operating temperature of S-1 and S-2 shall be at least 1750 degree F at all times. [Regulation 2-1-403]	Y	
Part 4	Operating temperature of S-1 and S-2 shall be recorded on a continuous temperature chart recorder. [Regulation 8-4-501]	Y	

Table IV-E
S-17 Solvent Cleaning

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 8, Rule 16	Organic Compounds - Solvent Cleaning Operations (9/16/98)		
8-16-303	Cold Cleaner Requirements	Y	
8-16-304	Trichloroethylene Limitation	Y	
8-16-501	Solvent Records	Y	
8-16-501.1	Trichloroethylene	Y	
8-16-501.2	All Other Solvents	Y	
SIP Regulation 8, Rule 16	Organic Compounds - Solvent Cleaning Operations (8/2/89)	Y	
8-16-303	Cold Cleaner Requirements	Y	
BAAQMD Condition No. 12205	Permit Conditions	Y	
Part 1	Net solvent usage not to exceed 300 gallons in any consecutive 12 month period. [Cumulative Increase]	Y	
Part 2	Recordkeeping [Cumulative Increase]	Y	

IV. Sources-specific Applicable Requirements

Table IV-F
S-18 through 20 F/O UV Printers

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 8 Rule 4	General Solvent and Surface Coating Operations (5/16/96)	N	
8-4-302	Solvents and Surface Coating Requirements	N	
8-4-302.3	VOC content of coating is less than 3.5 lb/gal	N	
8-4-312	Solvent Evaporation Loss Minimization	N	
8-4-501	Recordkeeping Requirements	N	
SIP Regulation 8 Rule 4	General Solvent and Surface Coating Operations (12/9/94)	Y	
8-4-302	Solvents and Surface Coating Requirements	Y	
8-4-501	Recordkeeping Requirements	Y	
Condition No. 12321	Permit Conditions (on a per-source basis)	Y	
Part 1	VOC content of ink not to exceed 1% by weight. [Offsets]	Y	
Part 2	Clean-up solvent usage [Cumulative increase]	Y	
Part 3	VOC content of ink not to exceed 1% by weight [Offsets]	Y	
Part 4	Recordkeeping [Offsets]	Y	

Table IV-G
S-21 through 24 F/O UV Printers

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 8 Rule 4	General Solvent and Surface Coating Operations (5/16/96)	Y	
8-4-302	Solvents and Surface Coating Requirements	Y	
8-4-302.3	VOC content of coating is less than 3.5 lb/gal	Y	

IV. Sources-specific Applicable Requirements

Table IV-G
S-21 through 24 F/O UV Printers

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
8-4-312	Solvent Evaporation Loss Minimization	Y	
8-4-501	Recordkeeping Requirements	Y	
SIP Regulation 8 Rule 4	General Solvent and Surface Coating Operations (12/9/94)	Y	
8-4-302	Solvents and Surface Coating Requirements	Y	
8-4-501	Recordkeeping Requirements	Y	
Condition No. 15725	Permit Conditions (on a per-source basis)		
Part 1	VOC content of ink not to exceed 1% by weight. [Offsets]	Y	
Part 2	Clean-up solvent usage not to exceed 4481 pounds Anhydrol in any consecutive 12 month period. [Cumulative increase]	Y	
Part 3	Recordkeeping [Offsets]	Y	

V. SCHEDULE OF COMPLIANCE

The permit holder shall comply with all applicable requirements cited in this permit. The permit holder shall also comply with applicable requirements that become effective during the term of this permit.

VI. PERMIT CONDITIONS

Any condition that is preceded by an asterisk is not federally enforceable.

COND #2055:

S-1 and S-2 boilers; S-11 through S-15 pre-expanders

1. The volatile organic compound (VOC) emissions from S-11, S-12, S-13, S-14, and S-15 Pre-Expanders shall be abated at all times by S-1 and S-2 Boilers. [Regulation 8, Rule 4]
2. The overall VOC destruction efficiency of S-1 and S-2 Boilers shall not be less than 90 percent by weight. [Regulation 8, Rule 4]
3. The operating temperature of S-1 and S-2 Boilers shall be maintained at a minimum of 1750 degrees Fahrenheit. [Regulation 2-1-403]
4. The operating temperature of each boiler shall be monitored and recorded using a continuous temperature chart recorder. These temperature records shall be retained on site for a minimum of five years from the date of entry and made available to District personnel upon request. [Regulation 8-4-501]

COND # 12205:

S-17 solvent cleaning operation

1. Net solvent usage at S-17 shall not exceed 300 gallons during any consecutive twelve month period. [Cumulative increase]
2. The owner/operator of S-17 shall maintain records of net solvent usage (based upon net make-up solvent added to S-17) on a monthly basis in a District-approved log. These records shall be retained on site for a minimum of five years from the date of entry and made available to District representatives upon request. [Cumulative increase]

VI. Permit Conditions

COND # 12321: S-18, 19, and 20 UV Printers

1. The volatile organic compound (VOC) content of any ink used at each UV Printer shall not exceed 1% VOC by weight. [Offsets]
2. Net clean-up solvent usage at each UV Printer shall not exceed 11.9 pounds of "Simple Green" (butyl cellosolve) in any 12 consecutive month period. Written authorization shall be obtained from the District prior to using any clean-up solvent other than "Simple Green". [Cumulative increase]
3. Records of clean-up solvent usage shall be maintained on a monthly basis in a District-approved logbook. These records shall be retained on site for a minimum of five years from the date of entry and made available to District representatives upon request. [Offsets]

COND # 15725: S-21 through 24 UV Printers

1. The volatile organic compound (VOC) content of any ink used at each UV Printer shall not exceed 1% VOC by weight. [Offsets]
2. Net clean-up solvent usage at each UV Printer shall not exceed 4481 pounds of Anhydrol in any 12 consecutive month period. Written authorization shall be obtained from the District prior to using any clean-up solvent other than Anhydrol. [Cumulative increase]
3. Records of clean-up solvent usage shall be maintained on a monthly basis in a District-approved logbook. These records shall be retained on site for a minimum of five years from the date of entry and made available to District representatives upon request. [Offsets]

VII. APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS

This section has been included only to summarize the applicable emission limits contained in Section IV, Source-Specific Applicable Requirements, of this permit. The following tables show the relationship between each emission limit and the associated compliance monitoring provisions, if any. The monitoring frequency indicates whether periodic (P) or continuous (C) monitoring is required. For periodic monitoring, the frequency of the monitoring has also been shown, either annual (A), quarterly (Q), monthly (M), daily (D), or on an event basis (E). No monitoring (N) has been required if the current applicable rule or regulation does not require monitoring, and the operation is unlikely to deviate from the applicable emission limit based upon the nature of the operation.

**Table VII-A
S1, AND S2 – BOILERS**

Type of limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
NOX	BAAQMD 9-7-301.1	Y		30 ppmv @3%O ₂ , dry, 3-hr avg		N	
	BAAQMD 9-7-305.1	Y		150 ppmv @ 3%O ₂ , dry, 3-hr avg		N	
	BAAQMD 9-7-306.1	Y		150 ppmv @ 3%O ₂ , dry, 3-hr avg		N	
CO	BAAQMD 9-7-301.2	Y		400 ppmv @3%O ₂ , dry, 3-hr avg		N	
	BAAQMD 9-7-305.2	Y		400 ppmv @3%O ₂ , dry, 3-hr avg		N	
	BAAQMD 9-7-306.2	Y		400 ppmv @3%O ₂ , dry, 3-hr avg		N	
VOC	BAAQMD Cond# 2055, Part 2	Y		VOC controlled by at least 90%	BAAQMD Cond# 2055, Part 4	C	Temperature chart recorder
	BAAQMD Cond# 2055, Part 3	Y		Minimum operating temperature = 1750 degrees F	BAAQMD Cond# 2055, Part 4	C	Temperature chart recorder
	BAAQMD 8-52-301.1	N	6/1/2000	< 2.8 lb/100 lb raw material processed	BAAQMD 8-52-501.1	P/M	Records
	BAAQMD 8-52-301.1	N	6/1/2000	< 2.8 lb/100 lb raw material processed	BAAQMD 8-52-503	P/D	Key system parameters

VII. Applicable Limits & Compliance Monitoring Requirements

**Table VII-A
 S1, AND S2 – BOILERS**

Type of limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
SO2	BAAQMD 9-1-301	Y		GLC of 0.5 ppm for 3 min. or 0.25 ppm for 60 min. or 0.05 ppm for 24 hours		N	
	BAAQMD 9-1-302	Y		Sulfur dioxide emission not to exceed 300 ppm (dry)		N	

**Table VII-B
 S-4, 5, 6, and 7 Foam Cup Molding Lines
 and S-10 Thermoforming**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-2-301	Y		Emissions of total carbon (dry basis) shall not exceed 15 lb/day and 300 ppm	None	N	None
	BAAQMD 8-52-301.1	N	6/1/2000	< 2.8 lb/100 lb raw material processed	BAAQMD 8-52-501.1	P/M	Records
	BAAQMD 8-52-301.1	N	6/1/2000	< 2.8 lb/100 lb raw material processed	BAAQMD 8-52-503	P/D	Key system parameters

VII. Applicable Limits & Compliance Monitoring Requirements

Table VII-C
S-8 Offset Printing Lines

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-4-302.2	N		90% weight reduction	BAAQMD 8-4-501	P/A	records
VOC	SIP 8-4-302.2	Y		5 tons POC on an annualized basis	BAAQMD 8-4-501	P	records

Table VII-D
S-11 through 15 Pre-Expanders

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-2-301	Y		Emissions of total carbon (dry basis) shall not exceed 15 lb/day and 300 ppm	None	N	None
	BAAQMD Cond# 2055, Part 2	Y		Minimum operating temperature = 1750 degrees F	BAAQMD Cond# 2055, Part 4	C	Chart Recorder
VOC	BAAQMD Cond# 2055, Part 3	Y		90% weight reduction	BAAQMD Cond# 2055, Part 4	C	Chart Recorder
	BAAQMD 8-52-301.1	N	6/1/2000	< 2.8 lb/100 lb raw material processed	BAAQMD 8-52-501.1	P/M	Records
	BAAQMD 8-52-301.1	N	6/1/2000	< 2.8 lb/100 lb raw material processed	BAAQMD 8-52-503	P/D	Key system parameters

VII. Applicable Limits & Compliance Monitoring Requirements

Table VII-E
S-17 Solvent Cleaning

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD Cond# 12205 Part 1	Y		Usage less than 300 gallons per year	BAAQMD Cond# 12205, Part 2	P/M	records

Table VII-F
S-18 through 20 F/O UV Printers

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-4-302.3	N		VOC content less than 3.5 lb/gal	BAAQMD 8-4-501	P/A	records
VOC	SIP 8-4-302.2	Y		5 tons POC on an annualized basis	BAAQMD 8-4-501	P/A	records
	BAAQMD Cond# 12321 Part 1	Y		Total ink usage from each source not to exceed 716 lb/yr	BAAQMD Cond# 12321 Part 4	P/M	records
	BAAQMD Cond# 12321 Part 2	Y		Net clean-up solvent usage from each source not to exceed 170 gal/yr	BAAQMD Cond# 12321 Part 4	P/M	records
	BAAQMD Cond# 12321 Part 3	Y		VOC content less than 1% by weight	BAAQMD Cond# 12321 Part 4	P/M	records

VII. Applicable Limits & Compliance Monitoring Requirements

Table VII-G
S-21 through 24 F/O UV Printers

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-4-302.3	N		VOC content less than 3.5 lb/gal	BAAQMD 8-4-501	P/A	records
	SIP 8-4-302.2	Y		5 tons POC on an annualized basis	BAAQMD 8-4-501	P/A	records
	BAAQMD Cond# 15725 Part 1	Y		VOC content less than 1% by weight	BAAQMD Cond# 15725 Part 3	P/Q	records
	BAAQMD Cond# 15725 Part 2	Y		Total clean-up solvent usage not to exceed 4481 lb/yr	BAAQMD Cond# 15725 Part 3	P/Q	records

VIII. TEST METHODS

The test methods associated with the emission limit of a District regulation are generally found in Section 600 of the regulation. The following table indicates only the test methods associated with the emission limits referenced in Section VII, Applicable Emission Limits & Compliance Monitoring Requirements, of this permit.

Table VIII
Test Methods

Applicable Requirement	Description of Requirement	Acceptable Test Methods
BAAQMD 6-301	Ringelmann No. 1 Limitation	Manual of Procedures, Volume I, Evaluation of Visible Emissions
BAAQMD 6-304	Tube Cleaning	Manual of Procedures, Volume I, Evaluation of Visible Emissions
BAAQMD 6-310	Particulate Weight Limitation	Manual of Procedures, Volume IV, ST-15, Particulates Sampling
SIP 8-2-301	Emissions of VOC	Manual of Procedures, Volume IV, ST-7, Non-Methane Organic Carbon Sampling; or EPA Method 25 or Determination of Total Gaseous Nonmethane Organic Emissions as Carbon, or EPA Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer
BAAQMD 8-4-302	Emissions of VOC	Manual of Procedures, Volume IV, ST-7, Non-Methane Organic Carbon Sampling; or EPA Method 25 or Determination of Total Gaseous Nonmethane Organic Emissions as Carbon, or EPA Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer
BAAQMD 8-52-301.1	Polystyrene Foam Product Manufacturing Operations	Manual of Procedures, Volume IV, ST-7, Non-Methane Organic Carbon Sampling; or EPA Method 25 or Determination of Total Gaseous Nonmethane Organic Emissions as Carbon, or EPA Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer

VIII. Test Methods

Table VIII
Test Methods

Applicable Requirement	Description of Requirement	Acceptable Test Methods
BAAQMD 9-1-302	General Emission Limitation	Manual of Procedures, Volume IV, ST-19A, Sulfur Dioxide, Continuous Sampling, or ST-19B, Total Sulfur Oxides Integrated Sample
BAAQMD 9-7-301.1	Determination of Nitrogen Oxides	Manual of Procedures, Volume IV, ST-13 A or B, Oxides of Nitrogen, Continuous or Integrated Sampling
BAAQMD 9-7-301.2	Determination of Carbon Monoxide and Stack-Gas Oxygen	Manual of Procedures, Volume IV, ST-6, Carbon monoxide, Continuous Sampling, and ST-14, Oxygen, Continuous Sampling

IX. GLOSSARY

BAAQMD

Bay Area Air Quality Management District

BACT

Best Available Control Technology

CAA

The federal Clean Air Act

CAAQS

California Ambient Air Quality Standards

CEQA

California Environmental Quality Act

CFR

The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

CO

Carbon Monoxide

Cumulative Increase

The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). Used to determine whether threshold-based requirements are triggered.

District

The Bay Area Air Quality Management District

EPA

The federal Environmental Protection Agency.

Excluded

Not subject to any District Regulations.

X. Glossary

Federally Enforceable, FE

All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60, (NSPS), Part 61, (NESHAPs), Part 63 (HAP), and Part 72 (Permits Regulation, Acid Rain), and also including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

HAP

Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by both 40 CFR Part 63, and District Regulation 2, Rule 5.

Major Facility

A facility with potential emissions of regulated air pollutants greater than or equal to 100 tons per year, greater than or equal to 10 tons per year of any single hazardous air pollutant, and/or greater than or equal to 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity as determined by the EPA administrator.

MFR

Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Act and implemented by District Regulation 2, Rule 6.

MOP

The District's Manual of Procedures.

NAAQS

National Ambient Air Quality Standards

NESHAPs

National Emission Standards for Hazardous Air Pollutants. Contained in 40 CFR Part 61.

NMHC

Non-methane Hydrocarbons

NO_x

Oxides of nitrogen.

NSPS

Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Act, and implemented by both 40 CFR Part 60 and District Regulation 10.

X. Glossary

NSR

New Source Review. A federal program for pre-construction review and permitting of new and modified sources of air pollutants for which the District is classified "non-attainment". Mandated by Title I of the Clean Air Act and implemented by 40 CFR Parts 51 and 52 as well as District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

Offset Requirement

A New Source Review requirement to provide federally enforceable emission offsets at a specified ratio for the emissions from a new or modified source and any pre-existing cumulative increase minus any onsite contemporaneous emission reduction credits. Applies to emissions of POC, NO_x, PM₁₀, and SO₂.

Phase II Acid Rain Facility

A facility that generates electricity for sale through fossil-fuel combustion and by virtue of certain other characteristics (defined in Regulation 2, Rule 6) is subject to Titles IV and V of the Clean Air Act.

POC

Precursor Organic Compounds

PM

Total Particulate Matter

PM₁₀

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

PSD

Prevention of Significant Deterioration. A federal program for permitting new and modified sources of air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

SIP

State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

SO₂

Sulfur dioxide

X. Glossary

Title V

Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

TSP

Total Suspended Particulate

VOC

Volatile Organic Compounds

Units of Measure:

bhp	=	brake-horsepower
btu	=	British Thermal Unit
g	=	grams
gal	=	gallon
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inches
max	=	maximum
m ²	=	square meter
min	=	minute
mm	=	million
ppmv	=	parts per million, by volume
ppmw	=	parts per million, by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge
scfm	=	standard cubic feet per minute
yr	=	year

X. APPLICABLE STATE IMPLEMENTATION PLAN

See Attachments